

EILEEN M. DECKER  
United States Attorney  
LAWRENCE S. MIDDLETON  
Assistant United States Attorney  
Chief, Criminal Division  
STEVEN R. WELK  
Assistant United States Attorney  
Chief, Asset Forfeiture Section  
KATHARINE SCHONBACHLER  
Assistant United States Attorney  
Asset Forfeiture Section  
California Bar No. 222875  
Federal Courthouse, 14th Floor  
312 North Spring Street  
Los Angeles, California 90012  
Telephone: (213) 894-3172  
Facsimile: (213) 894-7177  
E-mail: Katie.Schonbachler@usdoj.gov

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
\$175,121.75 IN WELLS FARGO  
BANK FUNDS,  
Defendant.

NO. CV 15-07149-R (JCx)

PROTECTIVE ORDER

THE MATADOR GROUP, INC.  
Claimant.

The Court having reviewed and considered the Stipulation  
Re: Protective Order filed by the parties in this matter on

1 March 4, 2016, and good cause appearing, the Court FINDS and  
2 ORDERS as follows:

3 1. On September 10, 2015, the government filed a  
4 complaint for forfeiture. On December 9, 2015, claimant filed a  
5 claim to the defendant \$175,121.75 in Wells Fargo Bank Funds.

6 2. The discovery that the government intends to produce  
7 to claimant in this matter includes personal identification  
8 information for others, including but not limited to names,  
9 addresses, telephone numbers, e-mail addresses, social security  
10 numbers, driver's license numbers, phone numbers, dates of  
11 birth, bank account numbers and other similar information  
12 (collectively "profile information").

13 3. Only claimant's counsel and claimant's counsel's  
14 employees and retained experts may review the un-redacted  
15 discovery, including profile information, in preparation for  
16 trial and they may not use the un-redacted profile information  
17 or any portion thereof except for the specific purpose of  
18 preparing or presenting a defense in this matter. Un-redacted  
19 profile information produced to the claimant's counsel shall be  
20 stored in a secure manner.

21 4. Claimant may review un-redacted profile information in  
22 claimant's counsel's office or at the courthouse, and only in  
23 the presence of claimant's counsel and/or claimant's counsel's  
24 agents. Claimant may not possess or in any way make a copy of  
25 any un-redacted profile information at any time. Claimant may  
26 not take or remove from claimant's counsel's office or the  
27 courthouse un-redacted profile information.

28 ///

1           5.    No one other than claimants' counsel, claimant's  
2 counsel's employees or retained experts, may review or possess a  
3 copy of any un-redacted profile information at any time. If  
4 claimant's counsel deems it appropriate or necessary for  
5 claimant to receive some or all of the profile information in  
6 this case, claimant's counsel may, without further Order of the  
7 Court, provide only redacted portions of the profile  
8 information, where an Assistant United States Attorney or the  
9 Court approves the redactions. A willful violation of this  
10 Protective Order by claimant, its counsel, or others may result  
11 in contempt of court proceedings or other civil or criminal  
12 sanctions.

13    ///

14    ///

15    ///

6. Within 60 days of the conclusion of this matter and the exhaustion of all appeals, claimant's counsel, claimant's counsel's employees, and any retained expert, must either: (1) return all documents containing profile information to the government, as well as all copies, and all notes, memoranda or other documents containing profile information obtained from documents produced in discovery, or (2) destroy the documents containing profile information and certify in writing to counsel for the government that the documents have been destroyed.

IT IS SO ORDERED.

D



DATED: March 7, 2016

\_\_\_\_\_  
THE HONORABLE MANUEL L. REAL  
UNITED STATES DISTRICT JUDGE

PRESENTED BY:

EILEEN M. DECKER  
United States Attorney  
LAWRENCE S. MIDDLETON  
Assistant United States Attorney  
Chief, Criminal Division  
STEVEN R. WELK  
Assistant United States Attorney  
Chief, Asset Forfeiture Section

\_\_\_\_/s/\_\_\_\_\_  
KATHARINE SCHONBACHLER  
Assistant United States Attorney

Attorneys for Plaintiff  
UNITED STATES OF AMERICA